DPR Environmental Monitoring

Aquatic Pesticide Registration
Review Evaluation

Data Package Review

- Environmental Monitoring Branch staff (EM) aquatic pesticide data review for adverse effects has evolved with the growth of EM's Surface Water Program.
- Historically, EM Surface Water staff reviewed pesticides intended for use on rice crops only.
- In the past three years review has expanded to include all aquatic use pesticides.

Data Package Review

- EM staff conduct evaluation of available scientific data to identify potential adverse problems in surface water or sediments.
- EM has a standing request of DPR's Registration Branch to review all registrations of new products that have aquatic sites on the label.

 Registration data packages are available to the Department of Fish and Game, Regional Water Quality Control Board, and State Water Resources Board for review.

Types of Registrations Reviewed

- Section 3 (full or conditional) data meets all requirements under FIFRA section 3 criteria.
- 24-C-Special Local Needs (SLN) Used when special pest need exists and no other product is available. Cannot use active ingredients not registered by USEPA.
- Section 18- Emergency exemption for emergency pest problem with no registered available alternative.

Reasons for Evaluation



- Environmental
 Hazards Statement
 often do not mitigate
 all environmental
 impacts.
- Federal label may not address unique California agricultural and environmental conditions.

Application Considerations

- Target pest and growth stage.
- Projection of future use of a pesticide on the target pest and resulting environmental loading.
- Rate of application
- Method of application
 - (air, ground, subsurface)

- Is the application to flowing or quiescent water?
- Possible environmental concerns to downstream receiving water.
- Phytoxicity concerns if treated water to be used for irrigation.

Chemical Considerations

- Parent chemical and metabolite half-life and breakdown in surface water and sediment.
- Persistence of parent chemical and metabolites in water and sediment.
- Resuspension of pesticide parent or metabolites in water and sediment.
- Oxygen depletion due to organic matter decay.
- Analytical methods

Scientific Studies

- Aquatic species toxicity and bioaccumulation studies
 - USEPA studies, reports, and Reregistration Eligibility Decisions
 - Registrant studies
 - University research studies

Additional Considerations

- Drinking water Maximum Contaminant Level concerns
- Swimming/fishing restrictions following application
- Reports of adverse incidence or problems in other areas where use has occurred

Evaluation Decisions

- Determine if water quality data is acceptable and supports registration.
- Determine if there is scientific evidence of an adverse effect or potential adverse effect to aquatic species from pesticide concentrations in surface water or sediments.

Evaluation Decisions

- Determine water hold requirements following application when needed.
- Make recommendations if additional water quality testing is required.
- Recommend a pesticide be restricted use when needed.

Additional Environmental Monitoring Evaluation

- Air Program
 - Application drift
 - Determines if additional application restrictions or buffers to waterways are needed
- Groundwater Program
 - Evaluates potential to contaminate ground water

Final Decision

Recommend that registration be approved, denied, or conditional on the basis that more studies or information be required.

Thank You.

